

## **Exhibit 2**

1 VOLUME: 1  
2 PAGES: 1-188  
3 EXHIBITS: See Index

4 IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
5 TRIAL DIVISION

6 PRINCE GEORGE CENTER, INC. )  
7 On Behalf of Itself and All )  
8 Others Similarly Situated )  
9 Plaintiffs )

10 v. ) Civil Action  
11 ) No. 5388

12 UNITED STATES GYPSUM CO., )  
13 et al. )  
14 Defendants )

15 -----  
16 Deposition of Robert A. Murphy  
17 December 18, 1992  
18 Boston, Massachusetts  
19 -----

20 PRESENT:

21 Speights & Runyan  
22 Daniel A. Speights, Esq.  
23 304 Lee Avenue  
24 Hampton, South Carolina 29924  
25 and  
26 Greitzer and Locks  
27 Jonathan W. Miller, Esq.  
28 1500 Walnut Street  
29 Philadelphia, Pennsylvania 19102  
30 for Plaintiffs

31 -----  
32 FRITZ & SHEEHAN ASSOCIATES, INC.  
33 295 Devonshire, Boston, MA 02110  
34 (617) 423-0500

1 Square?

2 MR. JONES: I'm sorry. We're not  
3 going to talk about the capability of what that  
4 means can do or can't do.

5 MR. SPEIGHTS: That wasn't my  
6 question, Mr. Jones.

7 Why don't you read the question back  
8 to Mr. Jones.

9 (The record was read by the reporter)

10 A. I believe if you review the 25,000-page  
11 inventory, you would most likely come up with all  
12 the Peter Kostic documents at Winthrop Square.

13 Q. What would be on the 25,000-page  
14 inventory indicating Peter Kostic documents?

15 A. His name. I would expect to find his  
16 name.

17 Q. So with respect to MDU Matt Murphy  
18 Deposition Exhibit 8 which we discussed this  
19 morning that has written in hand at the top, "Mr.  
20 Peter Kostic," you believe that name of Peter  
21 Kostic would appear on the inventory?

22 A. Well, I can't swear to a certainty that  
23 it would, but I believe it would.

24 MR. SPEIGHTS: Let's mark that

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1 document as Deposition Exhibit 3 to this  
2 deposition.

3 (Marked, Deposition Exhibit No. 3,  
4 letter September 7, 196-, document 20094074)

5 Q. Is the means referred to in Deposition  
6 Exhibit 2 a Casner & Edwards means?

7 MR. JONES: I don't know what that  
8 means, "means."

9 MR. SPEIGHTS: That's what we've been  
10 calling it, and you won't let me ask a whole lot  
11 about it.

12 Q. What I'm trying to determine is the  
13 system which is reflected in Exhibit 2, was that  
14 created by Casner & Edwards?

15 A. I believe there have been affidavits  
16 filed by Mr. Jones which provide detailed  
17 information as to the creation of that system or  
18 that means.

19 MR. JONES: They have in fact,  
20 however, been filed in camera.

21 A. So I don't know how far my counsel wants  
22 me to go in answering your question. I will take  
23 his guidance.

24 Q. I assure you your counsel is very alert

1 question today.

2 A. I can answer that this way: That before  
3 the re-review for Canada there were boxes which  
4 contain formula documents for asbestos-containing  
5 products. Those boxes were re-reviewed for notice,  
6 and to comply with whatever orders were given in  
7 Canada some were removed. I have not gone back  
8 after that to see whether there still are such  
9 boxes or such documents in Cambridge. They were  
10 there before the re-review. Whether the re-review  
11 caused them to come out or not I don't know. I  
12 believe there probably still are formula boxes  
13 considered to be trade secret in Cambridge for  
14 asbestos-containing products.

15 Q. How about specifically for Monokote?

16 A. Yes. That's my belief.

17 Q. Does the customer list include customers  
18 for asbestos-containing products?

19 A. Most likely.

20 Q. What do you mean by "customer" in the  
21 context of the customer list you have here?

22 A. My recollection of those lists are these  
23 are lists the client prepared of its customers for  
24 any number of reasons.